



JAMES E. JOHNSON
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

LAURA C. WILLIAMS
Labor and Employment Law Division
phone: (212) 356-2435
email: lawillia@law.nyc.gov

March 29, 2021

Via ECF

Honorable Loretta A. Preska
United States District Court
Southern District of New York
500 Pearl Street, Room 12A
New York, New York 10007

Counsel's request for an extension to April 12, 2021 to answer or otherwise respond to the complaint is granted. SO ORDERED.

Loretta A. Preska 3/30/21

Re: Samuel Figueroa v. The City of New York, the New York City Police Department, and Peter Mormile
Civil Action No.: 20-CV-10050

Dear Judge Preska:

I am an Assistant Corporation Counsel in the Office of James E. Johnson, Corporation Counsel of the City of New York, assigned to represent defendants City of New York and New York City Police Department ("City Defendants")¹ in the above-referenced matter. In accordance with Your Honor's Individual Practices, I write to request respectfully a one-week extension of time, from April 5, 2021 to April 12, 2021, for City Defendants to respond to the Complaint. While amenable to extending City Defendants' response deadline to April 12th, Plaintiff's counsel has conditioned consent to this extension request on City Defendants' guarantee that they will answer the complaint, instead of filing a motion to dismiss, conditions to which this Office cannot agree as a matter of policy. The requested extension will not affect any other scheduled dates in this litigation.

City Defendants previously requested, and the Court granted, extensions of time from January 5, 2021 to March 5, 2021, and from March 5, 2021 to April 5, 2021. This additional extension request is made due to the undersigned's very heavy caseload, which over the next two weeks includes preparing responses to three complaints in addition to the instant complaint, as well as preparation for a hearing before the New York State Division of Human Rights commencing on April 5th. The foregoing obligations necessitate additional time to prepare and finalize Defendants' response.

¹ Upon information and belief, the individually named defendant, Peter Mormile, has not been served with a summons and complaint.

I thank the Court for its consideration of this request.

Respectfully submitted,

/s/

Laura C. Williams
Assistant Corporation Counsel

cc: Zachary T. Tortora, Esq. (by ECF)
Attorney for Plaintiff